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NOTICE OF EX PARTE PRESENTATION

October 29, 1999

Magalie Roman Salas, Esq.
Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W.
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: In the Matter of Application by New York Telephone Company (d/b/a Bell Atlantic – New York), Bell Atlantic Communications, Inc., NYNEX Long Distance Company, and Bell Atlantic Global Networks, Inc. for Authorization To Provide In-Region, InterLATA Services in New York, Docket No. 99-295.

Dear Ms. Salas:

Please be advised that on Thursday, October 28th, Priscilla Hill-Ardoin, Jim Shelley, Melanie Fannin, Paul Mancini, Liz Ham, Rich Schanen, Randy Dysart, Austin Schlick and the undersigned representing SBC Communications Inc. met with Larry Strickling, Bob Atkinson, Carol Matthey, Margaret Egler, Jake Jennings, Audrey Wright, Bill Dever, Neil Fried, John Stanley, Bill Agee, Jessica Rosenworcel, and Claire Blue of the Common Carrier Bureau to discuss issues involving the Texas PUC's review of Southwestern Bell Telephone Company's compliance with Section 271(c). Specifically, we discussed the state of competition in Texas, Telcordia Technologies' review and testing of SWBT's OSS and performance measurements, and operational issues involving the provisioning of xDSL, coordinated "hot cuts," and the cost-basis of certain non-recurring charges for network elements. In the course of this discussion, Mr. Mancini presented a comparison of the state of competition in Texas versus New York. A copy of the handout Mr. Mancini used in his presentation is attached.

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In accordance with the Commission's rules concerning ex parte presentations, one copy of this notice is provided. Should you have any questions concerning this matter, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mark E. Hambro", followed by a long horizontal flourish line.

Attachment

cc: Mr. Strickling
Mr. Atkinson
Ms. Matthey
Ms. Egler
Mr. Jennings
Ms. Wright
Mr. Dever
Mr. Fried
Mr. Stanley
Mr. Agee
Ms. Rosenworcel
Ms. Blue

The State of Competition -- Texas Versus New York

1. Number of approved Interconnection Agreements:¹

Texas	215
New York	74

2. Number of carriers providing service over their own facilities:²

Texas	43
New York	35

3. Number of carriers reselling local service:

Texas	110
New York	65

4. Number of residential lines competitors are serving:

	<u>Total</u>	<u>Facilities Based</u>	<u>Resale</u>
Texas	265,000	60,000	205,000
New York	237,000	173,000	64,000

5. Number of business lines competitors are serving:

	<u>Total</u>	<u>Facilities Based</u>	<u>Resale</u>
Texas	836,000	669,000	167,000
New York	882,000	631,000	251,000

6. Total lines competitors are serving:

	<u>Total</u>	<u>Facilities Based</u>	<u>Resale</u>
Texas	1,101,000	729,000	372,000
New York	1,119,000	804,000	315,000

¹ Includes agreements with facilities-based, resale, and wireless carriers. Information on New York agreements is found in Bell Atlantic's Section 271 application for New York, Taylor Declaration, Attachment A ¶ 5.

² Direct comparisons between Texas and New York understate the relative degree of competitive entry in Texas, because Southwestern Bell Telephone Company serves about 20% fewer lines in Texas than Bell Atlantic serves in New York. Information on CLEC market entry is given as of July 1999 for both Texas and New York. New York data are found in Bell Atlantic's Taylor Declaration, Attachment A.

7. OSS Electronic Interfaces:³

	<u>Pre-Order</u>	<u>Ordering</u>
Texas	4	4
New York	2	2

8. Collocation Agreements:⁴

Texas	703
New York	776

9. Ported Numbers:⁵

Texas	297,000
New York	180,000

10. Geographic areas reached by competition:

Competing carriers operate in 299 out of 300 local calling areas in Texas. In New York, competition is largely confined to 300 square miles of New York City -- 10% of New York wire centers do not have even resale competition.⁶

³ Bell Atlantic's EDI and Web GUI interfaces are discussed in Bell Atlantic's Miller/Jordan Declaration ¶¶ 20, 35.

⁴ The number of collocation arrangements in New York (as of July 1999) is given in Bell Atlantic's Troy/Lacouture Declaration ¶ 29.

⁵ See Bell Atlantic's Troy/Lacouture Declaration ¶¶ 253, 255.

⁶ Resale penetration in New York is discussed in the Taylor Declaration, Attachment A ¶ 42.